



**Groundwork
for a Just World**

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May 14, 1999

Dockets Management Branch (HFA-305)

Food and Drug Administration

5630 Fishers Lane, Room 1061

Rockville, Maryland 20852 09 '99 MAY 18 11:37

Re: Docket No. 98N-1038, Food Irradiation

To whom it may concern:

I write on behalf of our 5000 member organization to support the Center for Science in the Public Interest's recommendation regarding labeling of irradiated foods:

"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Irradiation labels, like other labels, are required by the FDA to be truthful and not misleading. We believe that the terms "treated with radiation" or "treated by irradiation" should be kept. The word "pasteurization" is misleading because pasteurization process differs from irradiation. While many may recognize the radura as informative regarding food processing, the requirement of **both** label and radura irradiation disclosure should be continued. The fact of processing remains, and even if some consumers become familiar with the radura, new consumers such as youth, immigrants, etc., will not be. At the point of purchase, the symbol should be clearly understandable for everyone. Without labels consumers will believe the food has not been irradiated.

We urge extending the comment period past May 18 to allow more concerned citizens more time to write. Also, please put comments on the Internet so the public can be informed about who is taking part in this comment process.

Sincerely,

Lucinda Keils, Issues person; eco-justice

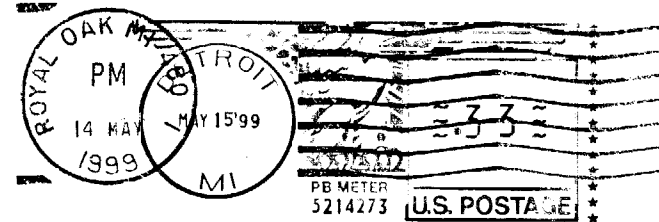
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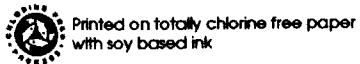




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